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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DEFENDANT UBER TECHNOLOGIES,  
INC., RAISER, LLC, AND RAISER-CA,  
LLC’S BRIEF IN SUPPORT OF UBER’S  
PRIVILEGE CLAIMS CHALLENGED BY  
PLAINTIFFS FOR THE JILL  
HAZELBAKER CUSTODIAL FILE –  
PURSUANT TO SPECIAL MASTER  
ORDER NO. 3 (DKT. 2472)**

This Document Relates to:  
  
ALL ACTIONS

1 Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in  
2 support of their position on the remaining privilege challenges for custodian Jill Hazelbaker. On  
3 March 25, 2025, Plaintiffs challenged 20 documents within this custodial file. On April 17, 2025,  
4 Plaintiffs challenged an additional 8 documents within this custodial file from privilege logs served  
5 after March 24, 2025, bringing the total number of challenged documents to 28. Through conferrals,  
6 the parties have narrowed their dispute to 12 challenges. These challenges are now submitted for the  
7 Special Master's review.

8 In preparing documents for the Special Master's review, Defendants identified one document  
9 that requires additional redactions: JCCP\_MDL\_PRIVLOG080005. In addition to the existing  
10 redactions, Defendants intend to redact privileged and non-relevant content from slides regarding  
11 "Antitrust Updates" and "Antitrust Proceedings," as they reflect legal advice from in-house counsel,  
12 as described on Defendants' privilege log entry for this document. Defendants will reproduce the  
13 document with corrected redactions and will make that version available for the Special Master's  
14 review as soon as possible.

15 Defendants incorporate by reference the legal standard and arguments set forth in their prior  
16 briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the  
17 applicable legal standard, and the factual material previously provided to the Special Master,<sup>1</sup> when  
18 reviewed in conjunction with the challenged documents and the associated metadata fields, support  
19 Uber's privilege and work product assertions. The remaining privilege claims submitted for the  
20 Special Master's determination should be upheld.

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26 <sup>1</sup> As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in  
27 disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3)  
28 a digest of third-parties present in its privilege log. Defense counsel will also be available for any  
questions the Special Master may have during the review process.

1 DATED: April 28, 2025

Respectfully submitted,

2 **SHOOK HARDY & BACON L.L.P.**

3 By: /s/ Jennifer Hill

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